

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN NORTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

1 lamin

v.

Case: 1:24-cr-20219

Assigned To: Ludington, Thomas L. Referral Judge: Morris, Patricia T.

Assign. Date: 4/24/2024

BRANDI LYNN FREEMAN,

a.k.a. Brandi Lynn Sian,

Defendant.

APP. 2.4. 2024
SAY OTT COURS

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE: Distribution of Fentanyl (21 U.S.C. § 841(a)(1))

On or about November 2, 2023, in the Eastern District of Michigan, Brandi Lynn Freeman, a.k.a. Brandi Lynn Sian, knowingly and intentionally distributed a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, section 841(a)(1).

COUNT TWO: Distribution of Fentanyl (21 U.S.C. § 841(a)(1))

On or about November 30, 2023, in the Eastern District of Michigan, Brandi Lynn Freeman, a.k.a. Brandi Lynn Sian, knowingly and intentionally distributed a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, section 841(a)(1).

COUNT THREE: Distribution of Fentanyl (21 U.S.C. § 841(a)(1))

On or about January 18, 2024, in the Eastern District of Michigan, Brandi Lynn Freeman, a.k.a. Brandi Lynn Sian, knowingly and intentionally distributed a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, section 841(a)(1).

COUNT FOUR: Distribution of Cocaine Base (21 U.S.C. § 841(a)(1))

On or about January 18, 2024, in the Eastern District of Michigan, Brandi Lynn Freeman, a.k.a. Brandi Lynn Sian, knowingly and intentionally distributed a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, section 841(a)(1).

FORFEITURE ALLEGATION

Pursuant to Fed. R. Cr. P. 32.2(a), the government hereby provides notice to the defendant of its intention to seek forfeiture of all proceeds, direct or indirect, or property traceable thereto, all property that facilitated the commission of the violations alleged, or property traceable thereto, and all property involved in, or property traceable thereto, of the violations set for in this.

<u>Substitute Assets</u>: If the property described above as being subject to forfeiture, as a result of any act or omission of Defendant:

- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred or sold to, or deposited with, a third party;
- c. Has been placed beyond the jurisdiction of the Court;
- d. Has been substantially diminished in value; or
- e. Has been commingled with other property that cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c).

Dated: April 24, 2024

THIS IS A TRUE BILL

s/Grand Jury Foreperson
GRAND JURY FOREPERSON

DAWN N. ISON United States Attorney

s/Anthony P. Vance

ANTHONY P. VANCE Assistant United States Attorney Chief, Branch Offices s/Roy R. Kranz

ROY R. KRANZ Assistant U.S. Attorney 101 First Street, Suite 200 Bay City, Michigan 48708-5747 (989) 895-5712 Roy.Kranz@usdoj.gov (P56903)

Companion Case information MUS	ST be completed by A	USA and initi	aled
United States District Court Eastern District of Michigan	Criminal Case Cover Sheet		Case Number
IOTE: It is the responsibility of the Assistant U.S.	Attorney signing this form to co	mplete it accurately	in all respects.
Companion Case Information		Companion Case Number:	
This may be a companion case based upon LCrR 57.10 (b)(4)1:		Judge Assigned:	
□ Yes X No		AUSA's Initials: ARK	
Case Title: USA v. Brandi L		randi Lynn Sia	<u>n</u>
X_Indictment/Indictment/	_Information no prior Information based u Information based u	pon prior compla	aint [Case number:] i) [Complete Superseding section below].
Superseding to Case No:	· · · · · · · · · · · · · · · · · · ·	Judge:	
□ Corrects errors; no additi □ Involves, for plea purpos □ Embraces same subject	onal charges or defenda es, different charges or a	nts. idds counts.	
<u>Defendant name</u>	<u>Cha</u>	rges	Prior Complaint (if applicable)
Please take notice that the below the above captioned case. Date: April 24, 2024	s/Roy R. Ki Roy R. Kran Assistant U 101 First St Phone: 98 Fax: 989-89 E-Mail addi	ranz z nited States At reet, Suite 200 9-895-5712	ttorney), Bay City, MI 48708

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.